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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

14 THIS DOCUMENT RELATES TO:

15 People of the State of California, et al.

16 v.

17 Meta Platforms, Inc., Instagram, LLC, Meta
18 Payments, Inc., Meta Platforms Technologies,
19 LLC

MDL No. 3047

Case No. 4:22-md-03047-YGR
4:23-cv-05448-YGR

**STIPULATION ON CONFIDENTIALITY
FOR EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

20 The MDL State AG Plaintiffs and Meta, YouTube, Snap, and TikTok (collectively, the
21 “Parties”) stipulate and agree as follows:¹

22 A. JCCP expert transcripts will be shared by YouTube, Snap, and TikTok with the State AG
23 Plaintiffs who have designated those same experts — or in whose cases Meta has designated
24 those same experts — with appropriate redactions for YouTube, Snap, and TikTok confidential
25 information.

26 B. Questioning attorneys will attempt to sequence the expert depositions to ask questions at

27 ¹ It is noted that in the interest of efficiency Defendants have also reached agreement on these
28 terms with other State AG Plaintiffs Massachusetts, Tennessee and Arkansas, who are not subject
to federal jurisdiction.

1 the end of the deposition session that rely upon or may elicit confidential information of
2 YouTube, Snap, and TikTok. In this way, State AG Plaintiffs may attend the earlier parts of the
3 deposition that cover general background, general industry issues, and Meta-specific issues, and
4 State AG Plaintiffs will be excused from the later YouTube, Snap, and TikTok specific portions
5 of the deposition. Questions that rely upon or elicit a mix of confidential and non-confidential
6 YouTube, Snap, and TikTok information will be asked in the later portion of the deposition not
7 attended by State AG Plaintiffs. No State AG Plaintiff may ask questions of an expert to elicit
8 opinions about YouTube, Snap, or TikTok, unless (i) those questions relate also to issues that
9 implicate Meta, such as discussion of the social media industry generally or comparisons of Meta
10 to YouTube, Snap, or TikTok and (ii) do not elicit any confidential information of YouTube,
11 Snap, or TikTok.

12 C. The State AG Plaintiffs will receive only copies of expert reports that have YouTube,
13 Snap, and TikTok confidential information redacted, including as exhibits at depositions. The
14 copies provided will be in a machine-readable format so that they are searchable.

15 D. Disclosure of YouTube, Snap, and TikTok confidential information should take place only
16 in the later portion of each deposition, as described in paragraph B above, so that real time and
17 rough draft versions of transcripts can be provided to State AG Plaintiffs as expeditiously as
18 possible for the portions of the depositions that the State AG Plaintiffs attend. However, if an
19 expert's answer to a question in the earlier portions of the deposition attended by State AG
20 Plaintiffs would reveal confidential information of YouTube, Snap, or TikTok, then the expert
21 should disclose that before answering, and the answer should be deferred to later in the deposition
22 unless that is impracticable, in which case the State AG Plaintiffs will be excluded from the
23 deposition at that point while any confidential information of YouTube, Snap, or TikTok is
24 disclosed. If the State AG Plaintiffs are asked to leave the deposition session because of
25 confidentiality issues of YouTube, Snap, or TikTok, that portion of the deposition will be
26 segregated for confidentiality review as provided in sections E and F, and the remaining
27 section(s) of the transcript not implicating confidential information of YouTube, Snap, and
28 TikTok may be provided to the State AG Plaintiffs as soon as possible in real time, rough draft,

1 and final.

2 E. YouTube, Snap, and TikTok will verify and/or update confidentiality designations within
3 20 days after receiving the final transcript, including producing portions to State AG Plaintiffs
4 that were overly designated as confidential information (if any) during the portions of the
5 deposition session not attended by State AG Plaintiffs as described in sections B and D above.
6 The State AG Plaintiffs will provide an email address where YouTube, Snap, and TikTok are to
7 send the final redacted transcripts.

8 F. Within 7 days after the later of (i) July 30, 2025, or (ii) receipt of a relevant final
9 deposition transcript in the JCCP cases, YouTube, Snap, and TikTok will produce to State AG
10 Plaintiffs machine-readable electronic files of the transcripts for expert depositions taken in the
11 JCCP case, including exhibits that do not contain YouTube, TikTok, or Snap confidential
12 information, where those same experts have been designated by the State AG Plaintiffs or Meta in
13 cases brought by the State AG Plaintiffs. Except, in no event shall transcripts in the JCCP matter
14 be provided to State AG Plaintiffs any later than 7 days before the date scheduled for the
15 deposition of the same witness in the MDL. Those transcripts and exhibits shall be redacted to
16 exclude confidential information of YouTube, Snap, or TikTok. The MDL State AG Plaintiffs
17 identify experts Auerbach, Gotlib, Honaker, Platt, Shear, Berman, Baiocchi, and Twenge as the
18 experts in the JCCP matter covered by this paragraph and will supplement this list as soon as
19 possible should additional experts be added. Relevant final expert deposition transcripts in the
20 MDL will be provided consistent with section E above, except as to the time frames stated in this
21 paragraph.

Dated: July 28, 2025

Respectfully submitted,

PHILIP J. WEISER

Attorney General
State of Colorado

ROB BONTA

Attorney General
State of California

/s/ Krista F. Batchelder

Krista Batchelder, CO Reg. No. 45066, pro hac vice
Deputy Solicitor General

Shannon Stevenson, CO Reg. No. 35542, pro hac
vice

Solicitor General

Elizabeth Orem, CO Reg. No. 58309

Danny Rheiner, CO Reg. No. 48821

Assistant Attorney Generals

Colorado Department of Law

Ralph L. Carr Judicial Center

Consumer Protection Section

1300 Broadway, 7th Floor

Denver, CO 80203

Phone: (720) 508-6384

krista.batchelder@coag.gov

Attorneys for Plaintiff State of Colorado, ex rel.

Philip J. Weiser, Attorney General

/s/ Megan O'Neill

Nicklas A. Akers (CA SBN 211222)

Senior Assistant Attorney General

Bernard Eskandari (CA SBN 244395)

Emily Kalanithi (SBN 256972)

Supervising Deputy Attorneys General

Nayha Arora (CA SBN 350467)

Megan O'Neill (CA SBN 343535)

Joshua Olszewski-Jubelirer

(CA SBN 336428)

Marissa Roy (CA SBN 318773)

Brendan Ruddy (CA SBN 297896)

Deputy Attorneys General

California Department of Justice

Office of the Attorney General

455 Golden Gate Ave., Suite 11000

San Francisco, CA 94102-7004

Phone: (415) 510-4400

Fax: (415) 703-5480

megan.oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State
of California*

RUSSELL COLEMAN

Attorney General

Commonwealth of Kentucky

/s/ Daniel I. Keiser

J. Christian Lewis (KY Bar No. 87109),

Pro hac vice

Philip Heleringer (KY Bar No. 96748),

Pro hac vice

Zachary Richards (KY Bar No. 99209),

Pro hac vice

Daniel I. Keiser (KY Bar No. 100264),

Pro hac vice

Matthew Cocanougher (KY Bar No. 94292),

Pro hac vice

Assistant Attorneys General

1024 Capital Center Drive, Suite 200

Frankfort, KY 40601

CHRISTIAN.LEWIS@KY.GOV

PHILIP.HELERINGER@KY.GOV

ZACH.RICHARDS@KY.GOV

1 DANIEL.KEISER@KY.GOV
2 MATTHEW.COCHANOUGH@KY.GOV
3 Phone: (502) 696-5300
4 Fax: (502) 564-2698

5
6 *Attorneys for Plaintiff the Commonwealth of*
7 *Kentucky*

8
9 **MATTHEW J. PLATKIN**

10 Attorney General
11 State of New Jersey

12 /s/ Kashif T. Chand

13 Kashif T. Chand (NJ Bar No. 016752008),
14 *pro hac vice*
15 Section Chief, Deputy Attorney General
16 New Jersey Office of the Attorney General,
17 Division of Law
18 124 Halsey Street, 5th Floor
19 Newark, NJ 07101
20 Tel: (973) 648-2052
21 Kashif.Chand@law.njoag.gov

22 *Attorney for Plaintiffs Matthew J. Platkin, Attorney*
23 *General for the State of New Jersey, and Cari Fais,*
24 *Acting Director of the New Jersey Division of*
25 *Consumer Affairs*

26
27 **MORGAN, LEWIS & BOCKIUS LLP**

28 By: /s/ Brian Ercole

Brian Ercole (*pro hac vice*)
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416
brian.ercole@morganlewis.com

Jesse S. Krompier, SBN 318760
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238
jesse.krompier@morganlewis.com

WILSON SONSINI GOODRICH & ROSATI

Brian M. Willen

WILSON SONSINI GOODRICH & ROSATI

1 1301 Avenue of the Americas, 40th Floor
2 New York, New York 10019
3 Telephone: (212) 999-5800
4 Facsimile: (212) 999-5899
5 Email: bwillen@wsgr.com

6 Lauren Gallo White
7 Samantha A. Machock
8 WILSON SONSINI GOODRICH & ROSATI
9 One Market Plaza, Spear Tower, Suite 3300
10 San Francisco, CA 94105
11 Telephone: (415) 947-2000
12 Facsimile: (415) 947-2099
13 Email: lwhite@wsgr.com
14 Email: smachock@wsgr.com

15 Christopher Chiou
16 WILSON SONSINI GOODRICH & ROSATI
17 633 West Fifth Street
18 Los Angeles, CA 90071-2048
19 Telephone: (323) 210-2900
20 Facsimile: (866) 974-7329
21 Email: cchiou@wsgr.com

22 WILLIAMS & CONNOLLY LLP
23 Joseph G. Petrosinelli
24 jpetrosinelli@wc.com
25 Ashley W. Hardin
26 ahardin@wc.com
27 680 Maine Avenue, SW
28 Washington, DC 20024
Telephone.: 202-434-5000
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC, Google
LLC, and Alphabet Inc.*

23 COVINGTON & BURLING LLP
24 By: /s/ Ashley M. Simonsen
25 Ashley M. Simonsen, SBN 275203
26 COVINGTON & BURLING LLP
27 1999 Avenue of the Stars
28 Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

1 Phyllis A. Jones, *pro hac vice*
2 Paul W. Schmidt, *pro hac vice*
3 COVINGTON & BURLING LLP
4 One City Center
5 850 Tenth Street, NW
6 Washington, DC 20001-4956
7 Telephone: + 1 (202) 662-6000
8 Facsimile: + 1 (202) 662-6291
9 Email: pajones@cov.com

10 *Attorney for Defendants Meta Platforms, Inc.*
11 *f/k/a Facebook, Inc.; Facebook Holdings,*
12 *LLC; Facebook Operations, LLC; Facebook*
13 *Payments, Inc.; Facebook Technologies, LLC;*
14 *Instagram, LLC; Siculus, Inc.; and Mark Elliot*
15 *Zuckerberg*

16 GEOFFREY DRAKE, *pro hac vice*
17 David Mattern, *pro ha vice*
18 KING & SPALDING LLP
19 1180 Peachtree Street, NE, Suite 1600
20 Atlanta, GA 30309
21 Tel.: 404-572-4600
22 Email: gdrake@kslaw.com
23 Email: dmattern@kslaw.com

24 *Attorneys for Defendants TikTok Inc. and*
25 *ByteDance Inc.*

26 MUNGER, TOLLES & OLSEN LLP
27 By: /s/ Jonathan H. Blavin
28 Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

29 Rose L. Ehler (SBN 29652)
30 Victoria A. Degtyareva (SBN 284199)
31 Laura M. Lopez, (SBN 313450)
32 Ariel T. Teshuva (SBN 324238)
33 MUNGER, TOLLES & OLSON LLP
34 350 South Grand Avenue, 50th Floor
35 Los Angeles, CA 90071-3426
36 Telephone: (213) 683-9100

1 Facsimile: (213) 687-3702
2 Email: rose.ehler@mto.com
3 Email: victoria.degtyareva@mto.com
4 Email: Ariel.Teshuva@mto.com

5 Lauren A. Bell (pro hac vice forthcoming)
6 MUNGER, TOLLES & OLSON LLP
7 601 Massachusetts Ave., NW St.,
8 Suite 500 E
9 Washington, D.C. 20001-5369
10 Telephone: (202) 220-1100
11 Facsimile: (202) 220-2300
12 Email: lauren.bell@mto.com

13 *Attorneys for Defendant Snap Inc.*
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28